

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
)	Case No. 08-13555-scc
)	
LEHMAN BROTHERS HOLDINGS., et al.,)	
Debtors.)	
)	

[PROPOSED] ORDER TO SHOW CAUSE

This matter having come before this Court by the *ex parte* application (the “Application”) of First Mortgage Corporation, for the entry of an order to show cause, granting a stay, and setting a hearing for May 7, 2015 on First Mortgage Corporation’ motion (“Motion”) for entry of an order pursuant to *Rule 60(b)(6)* of the *Federal Rules of Civil Procedure* seeking to vacate the “Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller, First Mortgage Corporation” (the “Order”) and the Court having considered the Application, and for good cause shown, it is hereby:

ORDERED, that the Defendants show cause before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, Room 623, New York, NY 10004-1408, on the 7th day of May, 2015 at _____, or as soon thereafter as counsel can be heard, why an order should not be issued and entered vacating the Order; and it is further

ORDERED that First Mortgage Corporation’s obligation to respond to the Indemnification ADR Package Notice within twenty (20) days of its service by LBHI is hereby stayed pending the entry of a further order by this Court; and is further

ORDERED that service of a copy of this Order and Motion shall be made upon Wollmuth Maher & Deutsch LLP, counsel for LBHI by express overnight mail no later than _____, 2015, which service shall be deemed good and sufficient service thereof; and it is further

ORDERED that to the extent LBHI desires to respond to the Motion, such response must be served on American Mortgage Law Group, counsel for First Mortgage Corporation, no later than _____, 2015; and it is further

ORDERED that the reply papers of First Mortgage Corporation, if any, must be served on or before _____, 2015.

Dated: March ___, 2015

UNITED STATES BANKRUPTCY JUDGE